

EXHIBIT 2

Videotaped Deposition of
Stacy Abrams
March 03, 2023

Freeman

vs.

Deebs

Confidential



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Freeman vs.
Deebs

Stacy Abrams

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
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4 LYNNE FREEMAN, an
5 individual,
6 Plaintiff,
7 vs. No. 1:22-cv-02435-LLS
8 TRACY DEEBS-ELKENANEY P/K/A
9 TRACY WOLFF, an individual;
10 et al.,
11 Defendants.

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14 CONFIDENTIAL
15 VIDEO DEPOSITION OF STACY ABRAMS
16 Reported Remotely through Videoconference
17 March 3, 2023
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23 Reported by:
24 Margaret A. Smith
25 RPR, CRR, CSR No. 9733
Job No.: 10115785

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Freeman vs.
Deebs

Stacy Abrams

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN, an
individual,
Plaintiff,
vs. No. 1:22-cv-02435-LLS
TRACY DEEBS-ELKENANEY P/K/A
TRACY WOLFF, an individual;
et al.,
Defendants.

Deposition of STACY ABRAMS taken on behalf of
Plaintiff, reported remotely through videoconference,
beginning at 6:57 a.m. PST, and ending at 1:05 p.m. PST,
on Friday, March 3, 2023, before Margaret A. Smith, RPR,
CRR, Certified Shorthand Reporter No. 9733.

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Deebs

Stacy Abrams

1 APPEARANCES (via videoconference):

2

3 FOR PLAINTIFF:

4 CSREEDER, PC

5 BY: MARK PASSIN, ESQUIRE

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11 FOR DEFENDANTS TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF;

12 ENTANGLED PUBLISHING, LLC; HOLTZBRINCK PUBLISHER, LLC,

13 D/B/A MACMILLAN; UNIVERSAL CITY STUDIOS, LLC:

14 COWAN, DEBAETS, ABRAHAMS & SHEPPARD LLP

15 BY: BENJAMIN HALPERIN, ESQUIRE

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Freeman vs.
Deebs

Stacy Abrams

1 APPEARANCES (via videoconference):
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3 FOR DEFENDANTS EMILY SYLVAN KIM; PROSPECT
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12 Also present:
13 Kevin Gonzalez, Aptus videographer
14 Trent Baer
15 Lynne Freeman
16 Tracy Deebs
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Stacy Abrams

1 someone in New York book publishing.

2 Q And what is your relationship between Walker
3 and Bloomsbury.

4 A So Walker is considered an imprint. They were
5 an independent publisher for many years. And then they
6 were purchased by Bloomsbury before I started there.
7 And so they became almost a subsidiary. I don't know if
8 that's the correct legal term. But in book publishing,
9 they're called an imprint.

10 Q So you were the editor -- at Bloomsbury -- I'm
11 sorry.

12 At Entangled, you were the editorial director
13 of publishing?

14 A Yes.

15 Q Was that your sole title the whole time you
16 were there?

17 A For many years. I have now moved into V.P. of
18 operations as well.

19 Q And what were your job duties as the editorial
20 director?

21 A At Entangled?

22 Q Excuse me?

23 A At Entangled?

24 Q At Entangled.

25 A Consider books for acquisition, sit on the

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Freeman vs.
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Stacy Abrams

1 acquisition committee for when other editors want to
2 bring in books, fashion the line to what we want it to
3 be. Consider jacket copy. Consider cover copy.
4 Present our books to MacMillan, our distributor. Edit
5 books to completion. And when I say "edit," I mean as a
6 content editor. That means I work with authors on
7 story, voice, line edits for consistency and -- and
8 sense. Changing pacing, changing plotting, things like
9 that.

10 I also worked for Entangled as a copy editor,
11 which is a different role. That role is solely grammar,
12 spelling, inconsistencies, and like. So two very
13 different roles there.

14 I would say that pretty much sums up the
15 majority of my role with Entangled.

16 Q Is acting as a content editor, is that typical
17 for an independent publishing company?

18 MR. HALPERIN: Object to the form.

19 THE WITNESS: Yes.

20 BY MR. PASSIN:

21 Q Is that typical for a -- any publishing company
22 to have a content editor?

23 MR. HALPERIN: Object to the form.

24 THE WITNESS: Yes, fairly standard.

25 BY MR. PASSIN:

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Stacy Abrams

1 Q Does that describe basically your role the
2 entire time you were at Entangled?

3 A To be a content editor, you mean?

4 Q No. You just described to me your role as an
5 editorial director.

6 Was that pretty much your entire role as
7 editorial director?

8 A Pretty much.

9 Q And how is your role different now as a V.P. of
10 operations?

11 A It's more helping run the company. So
12 overseeing budgeting. Overseeing employees. And a more
13 business focused side.

14 I am still editing. But not as frequently as I
15 used to be.

16 Q Let's go back to Bloomsbury. Okay. Can you
17 take me through your various positions there and your
18 roles in those positions.

19 MR. HALPERIN: Object to the form.

20 THE WITNESS: As an editorial assistant, I
21 mostly reviewed what we would call in the industry the
22 slush pile. At this time, the majority of submissions
23 came through the mail. So it was my job to open the
24 mail, review the mail, see if anything seemed
25 interesting, and share it with my direct reports at the

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Stacy Abrams

- 1 A It was a Tempest book.
- 2 Q All right. And then what about at Entangled?
- 3 A At Entangled, we did a series together for the
- 4 Brazen line. It was called the Shaken Dirty series.
- 5 And I do not recall each individual title.
- 6 Q How many titles were there?
- 7 A Four.
- 8 Q And what other books were published by
- 9 Entangled of Tracy Wolff's?
- 10 A The Crave series.
- 11 Q And how many books have currently been
- 12 published?
- 13 A Seven. Oh, I'm sorry. Six.
- 14 Q Six. So you've actually published closer to 13
- 15 books of Tracy Wolff's. Is that correct?
- 16 A This is why I'm asking published, because I am
- 17 an employee of Entangled. But, as I've said, I'm very
- 18 peripherally involved in the creative series. I did not
- 19 count it in my numbers.
- 20 Q Why do you say you're very peripherally
- 21 involved in the Crave series?
- 22 A Because I was the copy editor, not the content
- 23 editor.
- 24 Q So does that mean that you were not involved at
- 25 all in creating the story voice -- the story or voice of

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Stacy Abrams

1 MR. HALPERIN: No, I didn't have an objection
2 to that one. But just as a reminder going forward.

3 BY MR. PASSIN:

4 Q You said -- you said she was a great person to
5 write this series. What series?

6 A The Crave series.

7 Q All right. But it wasn't called the Crave
8 series at that time, was it?

9 MR. HALPERIN: Object to form.

10 THE WITNESS: No. It was just an idea.

11 BY MR. PASSIN:

12 Q And what was the idea?

13 MR. HALPERIN: Object to form.

14 THE WITNESS: Young adult paranormal series.

15 BY MR. PASSIN:

16 Q Now, would you characterize Emily Kim as a good
17 friend?

18 MR. HALPERIN: Object to the form.

19 THE WITNESS: I would consider her a friend but
20 also a colleague.

21 BY MR. PASSIN:

22 Q All right. Do you socialize with her?

23 MR. HALPERIN: Object to the form.

24 THE WITNESS: No.

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Stacy Abrams

1 Wolff a lot?

2 MR. HALPERIN: Object to the form.

3 THE WITNESS: Can you define "a lot."

4 BY MR. PASSIN:

5 Q Over the years, how often have you worked with
6 Tracy Wolff?

7 A Fairly frequently. I think we've already
8 covered I've done a lot of books with her.

9 Q Would you characterize Tracy Wolff as a friend?

10 MR. HALPERIN: Object to the form.

11 THE WITNESS: A friend and a colleague.

12 BY MR. PASSIN:

13 Q Would you characterize her as a good friend?

14 MR. HALPERIN: Object to the form.

15 THE WITNESS: No.

16 BY MR. PASSIN:

17 Q Do you socialize with her?

18 MR. HALPERIN: Object to the form.

19 THE WITNESS: Can you define "socialize."

20 BY MR. PASSIN:

21 Q I think you know what socialize means. Go out
22 to dinner, go out to parties, nonwork events.

23 A No.

24 Q Do you go out to work dinners or work parties
25 with her?

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Stacy Abrams

1 I, the undersigned, a Certified Shorthand Reporter of
2 the State of California, do hereby certify:

3 That the foregoing proceedings were taken before me
4 at the time and place herein set forth; that any
5 witnesses in the foregoing proceedings, prior to
6 testifying, were duly sworn; that a record of the
7 proceedings was made by me using machine shorthand,
8 which was thereafter transcribed under my direction;
9 that the foregoing transcript is a true record of the
10 testimony given.

11 Further, that if the foregoing pertains to the
12 original transcript of a deposition in a federal case,
13 before completion of the proceedings, review of the
14 transcript (X) was () was not requested.

15 I further certify I am neither financially
16 interested in the action nor a relative or employee of
17 any attorney or party to this action.

18 IN WITNESS WHEREOF, I have this date subscribed
19 by name.

20 Dated: 03/17/2023

21 
22 _____

23 Margaret A. Smith

24 RPR, CRR, CSR No. 9733

25

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DECLARATION UNDER PENALTY OF PERJURY

Case Name: Freeman vs. Deebs

Date of Deposition: 03/03/2023

Job No.: 10115785

I, STACY ABRAMS, hereby certify
under penalty of perjury under the laws of the State of
_____ that the foregoing is true and correct.

Executed this _____ day of
_____, 2023, at _____.

STACY ABRAMS

NOTARIZATION (If Required)

State of _____

County of _____

Subscribed and sworn to (or affirmed) before me on
this _____ day of _____, 20__,
by _____, proved to me on the
basis of satisfactory evidence to be the person
who appeared before me.

Signature: _____ (Seal)